

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPLAINT OF THE ASSOCIATED
MAIL AND PARCEL CENTERS, et.al.

Docket No. C2012-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
IN PARTIAL OPPOSITION TO
AMPC'S REQUEST FOR EXTENSION TO ANSWER**

(April 11, 2012)

The United States Postal Service ("Postal Service") hereby files its reply to the April 9, 2012, motion of the Associated Mail and Parcel Centers, et al. ("AMPC"), which seeks a 15-day extension of the deadline for filing an answer to the Motion of the United States Postal Service to Dismiss Complaint, filed April 4, 2012. While the Postal Service supports the granting of a reasonable extension, it opposes the length of the extension proposed by AMPC.

39 C.F.R. § 3001.21(b) allows seven days for an answer to a motion. According to 39 C.F.R. § 3001.16, extensions of time for making a filing may be granted by the presiding officer "upon motion for good cause shown." In its motion, AMPC states that an extension of fifteen days is needed in order to "communicate more completely with and incorporate information from the multiple other Complainants." AMPC does not offer any additional explanation for why an extension of fifteen days is required.

The Postal Service is all too aware of the complexities involved in coordinating the views of multiple parties, and fully supports the granting of a

reasonable extension on these grounds. However, the Postal Service believes that the time requested is excessive. While the Postal Service acknowledges that the coordination of positions may require additional meetings and conversations, AMPC has not demonstrated why the time normally provided for the filing of answers should essentially be tripled.¹ If, as AMPC states in its complaint, “time is of the essence in this matter,”² the Postal Service does not believe that a fifteen day extension should be granted.

Nevertheless, in the spirit of ensuring that AMPC has the fairest opportunity to be heard, the Postal Service does not oppose the Commission granting an extension of eight days. This extension would move the deadline for filing an answer to April 20, 2012. The Postal Service believes that this extension will best serve the interests of all parties, while balancing the need for timely resolution of this proceeding.

¹ 39 C.F.R. § 3001.21(b) provides that answers to motions must be filed within seven days after a motion is filed. According to this rule, the due date for answers to the Postal Service’s Motion to Dismiss (Motion of the United States Postal Service to Dismiss Complaint, Docket No. C2012-1, April 4, 2012) is April 11, 2012. AMPC’s request for an extension triples the time normally provided for filing answers to motions, by moving the due date to April 26, 2012.

² Complaint of the Associated Mail and Parcel Centers, et al., at 21 (March 15, 2012).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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